

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

ROBERT DAVID STEELE

et al

Plaintiffs,

v.

JASON GOODMAN

et al

Defendants.

Case 3:17-cv-601-MHL

CERTIFICATION

Plaintiffs' counsel, Steven S. Biss, pursuant to the Court's Order [*ECF No. 206*], hereby certifies as follows:

1. I have provided to Defendant Jason Goodman ("Goodman") a true and exact copy of all documents submitted to the Court at the July 15, 2020 Show Cause Hearing.
2. On July 16, 2020, I received from Mr. Goodman a .zip file, titled "Steele v Goodman Discovery.zip", containing the documents he provided to the Court. I also received an index, titled "Discovery 26a", that he was sending to the Clerk.
3. On July 19, 2020, I received from Mr. Goodman a file, titled "Steele v Goodman Defendant 26a with Index.pdf". The PDF consisted of 1,256 pages. In an accompanying email, Mr. Goodman stated that "[i]n the interest of providing a more organized document, I have added bates numbers to each item and included an improved

index. I have also included a previously, accidentally omitted trunach [sic] of emails from Manuel Chavez III”.

4. Mr. Goodman indicated that he “would like to arrange a phone call with you at your soonest convenience to make sure any remaining discovery disputes can be totally eliminated before the next hearing with judge Lauck.” I agreed and arranged a Court Reporter. On July 20, 2020, Mr. Goodman and I spoke. The call was cordial. Later that day, I received from Mr. Goodman a file, titled “Steele v Goodman Defendant 26a with Index SUP01.pdf”. The PDF consisted of 1,309 pages. In an accompanying email, Mr. Goodman stated that “I have attached an updated file which contains the supplemental material discussed in this morning’s phone call as well as an updated index.”

5. I was able to download and access all files emailed to me by Mr. Goodman.

6. Upon my review of Mr. Goodman’s documents, I had a few questions about attachments and an additional email address, Jason@21stcentury3D.com. Mr. Goodman was responsive to my questions and promptly produced the attachments or confirmed he could no longer access them.

DATED: July 22, 2020

Signature of Counsel on Next Page

ROBERT DAVID STEELE
EARTH INTELLIGENCE NETWORK

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CERTIFICATE OF SERVICE

I hereby certify that on July 22, 2020 a copy of the foregoing was filed electronically using the Court's CM/ECF system, which will send notice of electronic filing to counsel of record and all interested parties receiving notices via CM/ECF, and a copy was emailed in PDF to Defendants, Goodman and Lutzke.

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